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FILED
2022 OCT 4
CLERK
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

MIKEL RAY BROWN,

Plaintiff,

v.

DARRELL GRIGGS, individually and in his capacity as
Sergeant-at-Arms of the Utah State Senate

and

DANIEL MCCAY, individually and in his capacity as Chair
for Utah Senate Revenue and Taxation Standing Committee;
952 N 200 E St, Unit 952 Spanish Fork, UT 84660

and

SETH DALTON, individually and in his capacity as a
Trooper for the Utah Highway Patrol

and

GREG HOLLEY, individually and in his capacity as a
Trooper for the Utah Highway Patrol

and

WADE BREUR, individually and in his capacity as a
Trooper for the Utah Highway Patrol

and

ROGER DANIELS, individually and in his capacity as a
Trooper for the Utah Highway Patrol

and

ERNEST PETERSON, individually and in his capacity as a
Trooper for the Utah Highway Patrol

and

MICHAEL RAPICH, in his official capacity as
Superintendent of the Utah Highway Patrol; 4501 South
2700 West, Salt Lake City, UT 84129

Defendants.

PLAINTIFF'S REPLY TO DEFENDANTS' MOTION TO DISMISS

Case No. 1:22-cv-00091

District Judge Robert J. Shelby

Plaintiff, *MIKEL RAY BROWN* (hereinafter referred to as “Brown” or “Plaintiff,”) submits this response to this Honorable Court in response to the Defendants’ motion to dismiss pursuant to Fed.R.Civ.P. 12(b)(6).

Plaintiff is grateful to Defendant’s counsel for being so kind as to point out the deficiencies in Plaintiff’s original petition and complaint. Counsel’s arguments are well taken, and in the interest of justice, Plaintiff will be submitting an amended petition and complaint filed concurrently with this reply.

CONCLUSION

As noted above and to avoid any unnecessary court costs and delay, the Plaintiff submits, concurrently, with this filing, the amended petition and complaint.

RESPECTFULLY SUBMITTED THIS 4th Day of October, 2022



MIKEL RAY BROWN

CERTIFICATE OF SERVICE

I hereby certify that on October 4th, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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